

IN THE MARSHALL CIRCUIT COURT
STATE OF INDIANA

SZABOLCS CSAPO
Plaintiff

CAUSE NO. 50C01-2203-CT-000008
Marshall Circuit Court

v.

CHRISTOPHER COON

and

DARK NIGHT TRANSPORT LLC
Defendants

COMPLAINT AND DEMAND FOR JURY TRIAL

Comes the Plaintiff, Szabolcs Csapo, by and through counsel, John L. Smith, and for his cause of action against the Defendants Christopher Coon and Dark Night Transport LLC hereby states as follows:

1. At all relevant times, the Plaintiff Szabolcs Csapo was a resident of Orlando, Florida.
2. At all relevant times, the Defendant, Christopher Coon, was a resident of Williston, North Dakota and acting within the course and scope of his employment with Defendant, Dark Night Transport LLC
3. At all relevant times, the Defendant, Dark Night Transport LLC, was an North Dakota Corporation authorized to do business and doing business in the State of Indiana and employed Defendant Christopher Coon.
4. The events described herein occurred in Marshall County, State of Indiana, and this Court has proper venue in this action.

COUNT I

5. On or about August 5, 2020, the Defendant, Christopher Coon, was negligent in the operation, maintenance, and control of a tractor-trailer.

6. The Defendant, Christopher Coon, was traveling Eastbound of US 30 in Marshall County, Indiana, when he failed to keep a proper control of his vehicle and failed to keep a proper lookout and struck the vehicle the Plaintiff's vehicle in the rear end.

7. As a direct and proximate result of the acts and conduct of Defendant, Christopher Coon, the Plaintiff sustained severe and permanent bodily injury; has incurred and will continue to incur medical bills and expenses; past and future lost wages; and has suffered and will continue to suffer physical pain and inconvenience; all damages in excess of the minimal amount necessary to confer jurisdiction upon this Court.

8. The negligence of Defendant, Christopher Coon, in the use of a motor vehicle and/or his acts and/or omissions being otherwise negligent are the direct and proximate cause of all the damages suffered by the Plaintiff, or are a substantial cause in causing same.

COUNT II

9. On or about the aforementioned date, the Defendant, Dark Night Transport LLC was the owner of the vehicle driven by Defendant Christopher Coon that was involved in the subject collision.

10. At all times relevant, Defendant Christopher Coon was employed by, and acting within the scope of his employment as an employee for Defendant Dark Night Transport LLC or one of its agents, subsidiaries, distributorships, or owned businesses or companies, or corporations, and thereby causing the aforementioned Defendant Dark

Night Transport LLC to be either directly or vicariously liable for the injuries caused to Plaintiff.

11. As a direct and proximate result of the acts and conduct of Defendant, Dark Night Transport LLC, the Plaintiff sustained severe and permanent bodily injury; has incurred and will continue to incur medical bills and expenses; past and future lost wages and has suffered and will continue to suffer physical pain and inconvenience; all damages in excess of the minimal amount necessary to confer jurisdiction upon this Court.

12. The negligence of Defendant Dark Night Transport LLC or one of its employees acting within the scope of their employment, agents, subsidiaries, owned business, companies or corporations in their driving operations and/or their acts and/or omissions being otherwise negligent are the direct and proximate cause of all damages suffered by Plaintiff, or are substantial cause in causing the same.

WHEREFORE, Plaintiff, Szabolcs Csapo demands relief against Defendants Christopher Coon and Dark Night Transport LLC as follows:

1. Judgment against the Defendants, for compensatory damages in an amount in excess of the amount necessary to invoke the jurisdiction of this court and reasonably calculated to compensate Plaintiff for damages, to include the following:
 - a. Past and future medical expenses;
 - b. Past and future pain and suffering.
 - c. Past and future lost wages.
2. **Trial by jury;**

3. Any and all interest to which Plaintiff may be adjudicated to be entitled to from the date of filing this action; and
4. Any and all other appropriate relief to which Plaintiff may appear to be justly entitled.

Respectfully submitted,

/s/ John L. Smith

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Counsel for Plaintiff

Comes now the Plaintiff, Szabolcs Csapo, and demands a trial by jury on all issues so triable.

/s/ John L. Smith

John L. Smith #26921-31